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November 1, 2018

VIA ECF

Hon. Judith C. McCarthy
United States Magistrate Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601-4150

Re: *National Association for the Advancement of Colored People,
Spring Valley Branch v. East Ramapo Central School District*, No. 17 Civ. 8943

Dear Judge McCarthy:

We write on behalf of the Plaintiffs in the above referenced action to request the Court's authorization to file a document under seal in connection with Plaintiff's Letter Motion to compel non-party Yehuda Oshry to produce documents and provide testimony, dated October 25, 2018 (the "Letter Motion to Compel").

Plaintiffs request that Exhibit F to the Letter Motion to Compel, an excerpt from text messages produced in this case, be filed under seal. The document is designated "confidential" pursuant to the Parties' Stipulated Protective Order, dated February 6, 2018 (the, "Protective Order"), and was inadvertently filed as an exhibit to the Letter Motion to Compel (Docket No. 171-6). A copy of the Protective Order is attached to this letter as Exhibit A and was also previously filed with the Court (Docket No. 64). Promptly after Plaintiffs discovered that Exhibit F should have been filed under seal, they contacted the ECF clerk to temporarily restrict the exhibit so that it cannot be accessed by the public. Plaintiffs now request that the Court allow Exhibit F to be filed under seal.

Exhibit F consists of excerpts of text messages discussing public Board meetings and signature collections for Board elections. Plaintiffs do not believe that Exhibit F contains information that "adversely affect[s] the producing person's privacy obligations or personal interests." (Protective Order, "Definitions"). However, because Defendants designated this information as "confidential," Plaintiffs respectfully request that the above exhibit be filed under seal. Plaintiffs also attach a proposed order for the Court's consideration as Exhibit B to this letter. We appreciate Your Honor's consideration in this matter.

LATHAM & WATKINS LLP

Respectfully submitted,

/s/ Claudia T. Salomon
Claudia T. Salomon

cc: All Counsel of Record via ECF